

Scott M. Riemer (SR 5005)  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
HOWARD EPSTEIN,

Plaintiff,

09 CV 5608 (WHP)(MHD)

-against-

AFFIDAVIT OF AUDREY BEERMAN

HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY,

ECF Case

Defendant.

-----X

Audrey Beerman, being duly sworn, hereby deposes and says as follows:

1. I am a paralegal at Riemer & Associates, LLC. I submit this affidavit in support of Plaintiff's motion for summary judgment.
2. On or about August 1, 2008, I prepared the medical evidence in support of Howard Epstein's appeal letter dated August 1, 2008 ("Appeal Letter") for submission to Hartford.
3. I submitted the Appeal Letter and supporting medical evidence to Hartford on August 1, 2008 by FedEx, tracking number 791936595334.
4. I included the July 28, 2008 Report of Dr. Simon Lichtiger with the submission to Hartford on August 1, 2008.
5. **Exhibit 21** to the Affirmation of Scott M. Riemer, dated June 13, 2012, is a true and correct copy of the July 28, 2008 Report by Dr. Simon Lichtiger.

Dated: New York, New York  
June 13, 2012

Audrey Beerman  
Audrey Beerman

Sworn to me on this 13<sup>th</sup> day of June

[Signature]  
Notary Public

**SCOTT RIEMER**  
**Notary Public, State of New York**  
No. 02RI6089049  
Qualified in Westchester County, 5  
Commission Expires March 17, 2015

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 13, 2012, I served a true and complete copy of the foregoing Affidavit of Audrey Beerman by transmitting the same by electronic mail to the following individuals at the e-mail addresses indicated:

Michael H. Bernstein, Esq.  
Sedgwick LLP  
125 Broad Street, 39<sup>th</sup> Floor  
New York, New York 10004-2400  
Tel.: (212) 422-0202  
Fax: (212) 422-0925  
*Attorneys for Defendants*

I also certify that this document filed through the ECF system will be sent electronically to all registered participants on June 13, 2012.

Dated: New York, New York  
June 13, 2012

/s/Scott M. Riemer  
Scott M. Riemer (SR5005)